

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

PLATINUMTEL COMMUNICATIONS, )  
LLC, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
ZEFCON, LLC d/b/a TELISPIRE, )  
TELISPIRE, INC. et al. )  
 )  
Defendants. )

Court No.: 08 CV 1062

**DEFENDANTS RAMSEY NATOUR AND US MOBILE'S MOTION FOR LEAVE  
TO FILE AMENDED MOTION TO DISMISS AND MEMORDANUM OF LAW**

Defendants, Ramsey Natour and US Mobile, by their attorneys, Thomas F. Courtney & Associates, PC, and moves this Court for leave to file their Amended Motion to Dismiss and Memorandum of Law, *instantly*, and in support thereof, states as follows:

1. Counsel for Defendant Natour has just appeared on his behalf.
2. Plaintiffs have filed an amended complaint, and motions to dismiss are pending, but a response has not yet been filed. The issues to be raised by Natour and US Mobile are similar to the other Defendants except that the Defendant Natour has been named individually in the complaint, which required further investigation.
3. Additionally, the memorandum of the Defendants is 17 pages and leave must be sought from the Court to allow it to be filed.
4. Federal Rule of Civil Procedure 15 states, "...leave shall be freely given when justice so requires."

WHEREFORE, Defendants Ramsey Natour and U.S. Mobile, prays that this Honorable Court grant it leave to file its Amended Motion and Memorandum, *instanter*.

Respectfully Submitted,

By: \_\_\_\_\_ /ss/ Thomas F. Courtney, Jr  
Attorneys for Defendants

Thomas F. Courtney & Associates  
Attorneys for Defendants  
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**PROOF OF SERVICE**

I, the undersigned attorney, certify that I filed this Proof of Service and the documents identified herein through the Court's ECM/CF document filing system, which will cause electronic notification of the filing to be sent to all counsel of record.

/ss/ Thomas F. Courtney Jr. .